

1 **FOLEY & LARDNER LLP**
 2 ONE MARITIME PLAZA, SIXTH FLOOR
 3 SAN FRANCISCO, CA 94111-3409
 4 TELEPHONE: 415.434.4484
 5 FACSIMILE: 415.434.4507

6 LAURENCE R. ARNOLD, CA BAR NO. 133715
 7 EILEEN R. RIDLEY, CA BAR NO. 151735
 8 SCOTT P. INCIARDI, CA BAR NO. 228814
 9 Attorneys for STANFORD HOSPITAL & CLINICS and
 10 LUCILE PACKARD CHILDREN'S HOSPITAL

11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**

13 STANFORD HOSPITAL & CLINICS and
 14 LUCILE PACKARD CHILDREN'S
 15 HOSPITAL,

16 Petitioners,

17 vs.

18 SERVICE EMPLOYEES
 19 INTERNATIONAL UNION, LOCAL 715,

20 Respondent.

21 Case No: 5:07-CV-05158-JF

22 [PROPOSED] ORDER GRANTING
 23 STANFORD HOSPITAL AND
 24 CLINICS AND LUCILE PACKARD
 25 CHILDREN'S HOSPITALS' MOTION
 26 TO COMPEL FURTHER RESPONSES
 27 TO DISCOVERY REQUESTS
 28 PROPOUNDED TO LOCAL 715

Date: August 27, 2008

Time: 9:30 A.M.

Dept: Courtroom 4, 5th Floor

Judge: Hon. Jeremy Fogel

Magis. Judge: Hon. Richard Seeborg

29 SERVICE EMPLOYEES
 30 INTERNATIONAL UNION, LOCAL 715

31 Petitioner and Counter-
 32 Respondent,

33 vs.

34 STANFORD HOSPITAL & CLINICS and
 35 LUCILE PACKARD CHILDREN'S
 36 HOSPITAL

37 Respondents and Counter-
 38 Petitioners.

39 Case No: 5:08-CV-00213-JF

40 Judge: Hon. Jeremy Fogel

41 [PROPOSED] ORDER GRANTING STANFORD HOSPITAL AND CLINICS AND LUCILE PACKARD
 42 CHILDREN'S HOSPITALS' MOTION TO COMPEL FURTHER RESPONSES TO DISCOVERY REQUESTS
 43 PROPOUNDED TO LOCAL 715

44 CASE NOS. 5:07-CV-05158-JF, 5:08-CV-00213-JF, 5:08-CV-00215-JF;
 45 5:08-CV-00216-JF; 5:08-CV-01726-JF; 5:08-CV-01727-JF

1 SERVICE EMPLOYEES
2 INTERNATIONAL UNION, LOCAL 715

3 Petitioner,

4 vs.

5 STANFORD HOSPITAL & CLINICS and
6 LUCILE PACKARD CHILDREN'S
7 HOSPITAL

8 Respondents.

Case No: 5:08-CV-00215-JF

Judge: Hon. Jeremy Fogel

9 SERVICE EMPLOYEES
10 INTERNATIONAL UNION, LOCAL 715

11 Petitioner,

12 vs.

13 STANFORD HOSPITAL & CLINICS and
14 LUCILE PACKARD CHILDREN'S
15 HOSPITAL

16 Respondents.

Case No: 5:08-CV-00216-JF

Judge: Hon. Jeremy Fogel

17 SERVICE EMPLOYEES
18 INTERNATIONAL UNION, LOCAL 715

19 Petitioner,

20 vs.

21 STANFORD HOSPITAL & CLINICS and
22 LUCILE PACKARD CHILDREN'S
23 HOSPITAL

24 Respondents.

Case No: 5:08-CV-01726-JF

Judge: Hon. Jeremy Fogel

25 SERVICE EMPLOYEES
26 INTERNATIONAL UNION, LOCAL 715

27 Petitioner,

28 vs.

29 STANFORD HOSPITAL & CLINICS and
30 LUCILE PACKARD CHILDREN'S
31 HOSPITAL

32 Respondents.

Judge: Hon. Jeremy Fogel

1
2 The Motion to Compel Further Responses To Discovery Requests Propounded to
3 Local 715 (the “Motion”) brought by Stanford Hospital And Clinics and Lucile Packard
4 Children’s Hospital (the “Hospitals”), in the above-referenced related cases came on for
5 hearing before the above-captioned Court, the Honorable Richard Seeborg presiding, on
6 _____, 2008.

7 The Court, having considered the pleadings in this matter, and all papers submitted
8 in support of, and in opposition to, said motion, and having heard the argument of
9 counsel, and good cause appearing therefor, hereby **GRANTS** the Motion in its entirety.

10 Service Employees International Union, Local 715 (“Local 715”) shall provide
11 full and complete responses to request for production numbers 1-14, 17-21, 27-28, 31, 34,
12 37, 40, 42-45, 48-53, and 56 in each case in accordance with Federal Rules of Civil
13 Procedure. Local 715’s responses shall include electronically stored information that is
14 responsive to the requests, including website-related information. Any withholding of
15 responsive information on the basis of a privilege or work product protection shall be
16 supported by a privilege log that identifies the documents withheld on a document by
17 document basis, including the following information:

- 18 1) the Bates number of the document;
- 19 2) the date of the document;
- 20 3) the specific individual author/s of the document;
- 21 4) the specific individual recipient/s of the document;
- 22 5) a precise document description;
- 23 6) the specific privilege/s claimed; and
- 24 7) the present location of the document.

25 Local 715 shall not withhold responsive information not subject to a privilege or work
26 product protection.

27 Local 715 is ordered to serve responsive documents on or before the tenth

1 business day following the date of this order.

2 It is further ordered that Local 715 shall pay the Hospitals' reasonable expenses
3 incurred in making this motion, including attorneys fees, in the amount of
4 \$_____.

5 IT IS SO ORDERED.

6 DATE:
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

HON. RICHARD SEEBORG
MAGISTRATE JUDGE OF THE
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
CALIFORNIA, SAN JOSE DIVISION